

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

CACEIS BANK LUXEMBOURG and CACEIS
BANK,

Defendants.

Adv. Pro. No. 11-02758 (SMB)

STIPULATION FOR EXTENSION OF TIME

On June 16, 2014, Caceis Bank Luxembourg and Caceis Bank France, formerly known as Caceis Bank (collectively, “Caceis” or the “Defendants”) filed a motion to dismiss the Complaint (the “Motion”) in the above-captioned adversary proceeding (Adv. Pro. No. 11-02758 (BRL)) (the “Adversary Proceeding”). The Trustee has requested an extension of time to respond to the Motion or to file an amended Complaint. Caceis does not oppose the Trustee’s request for a further extension.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that:

Caceis does not recognize that the Trustee has the right to amend the Complaint as a matter of course nor does Caceis consent to such an amendment. The Trustee, however, asserts that he has a right to amend the Complaint as a matter of course. To the extent the Trustee seeks to amend the Complaint, any such amendment shall be filed and served on the undersigned counsel to the Defendants on or before September 24, 2014. Caceis shall file and serve on the undersigned counsel to the Trustee any response or make any motion with respect to such amendment on or before November 12, 2014.

If the Trustee objects to the Motion, he shall file and serve on the undersigned counsel to the Defendants any such objection on or before September 24, 2014. Caceis shall file and serve on the undersigned counsel to the Trustee any reply papers on or before October 15, 2014. The hearing date for the Motion, currently set for October 2, 2014, shall be rescheduled for November 19th, 2014.

The parties to this Stipulation reserve all rights and defenses they may have, and entry into this stipulation shall not impair or otherwise affect such rights and defenses , including, without limitation, any right to a jury trial.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

Dated: August 29, 2014

YOUNG CONAWAY STARGATT &
TAYLOR, LLP

KELLEY DRYE & WARREN LLP

By: /s/ Matthew B. Lunn
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Attorneys for the Defendants

SO ORDERED:

Dated: August 29th, 2014

/s/ STUART M. BERNSTEIN
Honorable Stuart M. Bernstein
United States Bankruptcy Judge

